

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

Richard P., by and for **R.P.**, and Denise L.,)
by and for **K.L.**,)

Plaintiffs)

v.)

SCHOOL DISTRICT OF THE CITY)
OF ERIE, PENNSYLVANIA; JANET)
WOODS, Individually and in her Capacity)
as Principal of Strong Vincent High)
School; and **LINDA L. CAPPABIANCA**,)
Individually and in her Capacity as)
Assistant Principal of Strong Vincent High)
School,)

Defendants)

Civil Action No. 03-390 Erie

JURY TRIAL DEMANDED

DEFENDANTS' SUPPLEMENTAL PRETRIAL STATEMENT

Defendants The School District of the City of Erie, Pennsylvania, Janet M. Woods, and
Linda L. Cappabianca, respectfully submit the following Defendants' Supplemental Pretrial
Statement.

Witnesses

In addition to the persons identified in Defendants' Pretrial Statement defendants may call
the following persons as witnesses at trial:

MaryAnne Albaugh, M.D.
Erie, PA

Kirsten E. Brunner-Martinez, D.O.
Erie, PA

D. Carlson, M.D.
Erie, PA

Kelly A. Hough
Erie, PA

Jill Houston
Erie, PA

Charles R. Joy, M.D.
Erie, PA

Jennifer L. Vaglia
Erie, PA

Robert E. Wilson, M.D.
Erie, PA

Exhibits

In addition to the documents identified in Defendants' Pretrial Statement defendants may offer the following documents as exhibits at trial:

1. Records regarding all medical treatment received by K.L., including mental health treatment, from and including February 13, 1997 to the present time.
2. Records regarding all medical treatment received by R.P., including mental health treatment, from and including May 8, 2001 to the present time.
3. All records of Sarah Reed Children's Center regarding all services provided by Sarah Reed Children's Center that relate to K.L. and R.P. from and including April 11, 1995 to the present time.

Respectfully submitted,

/s/ James T. Marnen

James T. Marnen
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Attorney for Defendants,
The School District of the City of Erie, Pennsylvania,
Janet M. Woods and Linda L. Cappabianca

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 26th day of September, 2005, a copy of the within document was served on all counsel of record and unrepresented parties in accordance with the applicable rules of court.

/s/ James T. Marnen
James T. Marnen